

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

**STATE DEFENDANTS' MOTION FOR LEAVE
TO FILE A BRIEF IN EXCESS OF 25 PAGES**

Pursuant to Local Rule 7.1(D), State Defendants file this Motion for Leave to File a Brief in Excess of 25 Pages (“Motion for Leave”) and respectfully request that the Court grant State Defendants leave to file a brief in support of its Motion to Dismiss certain claims brought in Curling Plaintiffs’ Third Amended Complaint [Doc. 627] and Coalition Plaintiffs’ First Supplemental Complaint of Plaintiffs Coalition for Good Governance, Laura Digges, William Digges III, Ricardo Davis, and Megan Missett [Doc. 628] in excess of twenty-five pages and not to exceed **fifty** pages. State Defendants’ Motion to Dismiss is due October 25, 2019.

In support of this Motion for Leave, State Defendants show that the body of Curling Plaintiff’s Third Amended Complaint is forty-five pages long,

and the body of Coalition Plaintiff's First Supplemental Complaint is seventy-two pages long. [*See generally* Docs. 627 & 628]. Together totaling one-hundred-seventeen pages, these new Complaints add claims regarding ballot-marking devices ("BMDs"), but also still include claims challenging direct-recording electronic voting machines ("DREs"). Because of the distinct differences between the BMDs and DREs, additional factual and legal background is necessary for State Defendants to sufficiently articulate their arguments in the Motion to Dismiss. As such, State Defendants require additional pages to sufficiently prepare its Motion to Dismiss.

A proposed order is attached hereto as Exhibit "A" for the Court's consideration.

Respectfully submitted this 23rd day of October, 2019.

/s/ Vincent R. Russo

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CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing STATE DEFENDANTS' MOTION FOR ADDITIONAL PAGES has been prepared in Century Schoolbook 13, a font and type selection approved by the Court in L.R. 5.1(B).

/s/ Vincent R. Russo
Vincent R. Russo

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the within and foregoing **STATE DEFENDANTS' MOTION FOR LEAVE TO FILE A BRIEF IN EXCESS OF 25 PAGES** on all parties by electronically filing it with the Clerk of the Court using the Next Gen CM/ECF filing system, which will automatically send an email notification of such filing to counsel for the parties.

This 23rd day of October, 2019.

/s/ Vincent R. Russo
Vincent R. Russo